

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-454-458]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory; however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 4, 2006

Respectfully submitted,

R20061PP454

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-454

[a] Please confirm, or explain if you are unable to confirm, that there is nothing that would preclude the Board of Governors from establishing an effective date for the modifications to the DMCS that were related to the Forever Stamp at an earlier time than the effective date for the remainder of the Opinion and Recommended Decision changes. [In other words, if the Commission released the Opinion and Recommended Decision on February 1, 2007, could the Board of Governors establish an effective date for the DMCS modifications related to the Forever Stamp of March 1, 2007, and an effective date of April 1, 2007 for the remainder of the rate and DMCS changes?]

[b] Please confirm, or explain if you are unable to confirm, that if you have confirmed subpart a of this Interrogatory, it would be possible to implement the Forever Stamp in this Docket, namely, have a period of time when it would be sold for 39¢ and then be utilized when the rate is 42¢.

DBP/USPS-455

[a] If the Forever Stamp were to be implemented in this Docket, please identify and quantify the expected shortfall in revenue.

[b] Please fully explain how that shortfall value was determined and calculated.

[c] Please explain how the added revenue to cover this shortfall can be achieved.

DBP/USPS-456 At the present time, the Postal Service has a series of regulations and procedures that relate to the action that would be taken when shortpaid or unpaid mailpieces are deposited into the mail.

[a] Will the introduction of a Forever Stamp either require or result in any changes to these regulations or procedures?

[b] Please explain the changes that would be required.

[c] Please discuss any changes that are being considered.

DBP/USPS-457

[a] Please confirm, or explain if you are unable to confirm, that under the present regulations the cost of mailing a post card is 24¢.

[b] Please confirm, or explain if you are unable to confirm, that it would be permissible to utilize a letter-rate 39¢ stamp to pay the postage on this post card and there are many instances where mailers will do so.

[c] Please discuss the reasons why mailers will utilize the 39¢ stamp as discussed in subpart b above.

[d] If the proposed regulations and rates are approved and implemented, will a mailer be able to utilize a Forever Stamp to pay the postage on a post card?

[e] If not, why not?

DBP/USPS-458 A number of previous Interrogatories [DBP/USPS-336, 339, 341, 366, 367, 368, and 457 for example] relate to the use of the Forever Stamp and/or non-

denominated semi-postal stamps and/or other non-denominated stamps at their face value in a number of mailing scenarios.

[a] If there are any instances in your response to these previous interrogatories where the stamp will not be honored at its face value, will the mailer be entitled to apply for and receive a refund of the face value of the stamp that was not honored? For example, under the proposed rates and regulations if a mailer utilizes two Forever Stamps on a two-ounce letter and the second Forever Stamp is not honored to pay [actually overpay] the cost of the second ounce and the mailpiece is delivered 20¢ postage due, will the mailer be able to apply for and receive a refund of 42¢?

[b] If not, why not?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin August 4, 2006
